

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: THOMAS CURRAN : Bankruptcy No. 24-14202AMC
:
Debtor : Chapter 7

**DEBTOR'S RESPONSE TO MOTION OF CHAPTER 7 TRUSTEE TO TURNOVER
PROPERTY OF THE ESTATE AND FOR SANCTIONS**

THOMAS CURRAN, through his attorney, Zachary Perlick, Esquire, hereby responds to the Chapter 7 Trustee's Motion and sets forth in support thereof the following:

JURISDICTION

1.-3. Admitted.

BACKGROUND

4.-5. Admitted.

PAYMENT TO TD BANK, NA

6. Admitted in part, denied in part. The debtor amended his Statement of Financial Affairs at the direction of the Chapter 7 Trustee. The debtor sold his home in August 2024. Part of the agreement with the buyer entailed the buyer paying off a judgment held against the debtor, then at settlement, the debtor would repay the buyer. The buyer paid the judgment through her TD Bank account; the debtor repaid the buyer after settlement.

7. Admitted.

8.-22. Denied. The debtor does not possess the check requested by this motion. The debtor has already supplied the

Trustee with the only document showing this payment. (Attached as Exhibit A).

REQUEST FOR ENTRY OF AN ORDER SANCTIONING DEBTOR

23.-25. Denied. The debtor has already supplied the Trustee with the only document in his possession showing the payment to the judgment creditor.

Wherefore, Debtor prays that this court enter an DENYING the Motion for Turnover of Property to the Estate.

Respectfully submitted,

/Zachary Perlick/
ZACHARY PERLICK, ESQUIRE

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CERTIFICATION OF SERVICE

I, Zachary Perlick, Esquire, attorney for the Debtor in the above-captioned matter do hereby certify that I sent to the Trustee and all interested parties in the above captioned case, a true and correct copy of the Debtor's response to the Trustee's Motion for Turnover of Property and Sanctions by first class mail or electronic mail on May 29, 2025.

BY: /Zachary Perlick/
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